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April 10, 2025

Via ECF
Hon. John Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007
CronanNYSDChambers@nysd.uscourts.gov

Re: Jane Doe v. Tal Alexander, Case No. 25-CV-2077

Dear Judge Cronan:

We represent Defendant Tal Alexander in the above-captioned matter. With the consent of Plaintiff, we write pursuant to Rule 1(a) of Your Honor's Individual Rules and Practices in Civil Cases. The Court requested that the parties submit a proposed case management plan and scheduling order by April 11, 2025. *See* ECF No. 15. Plaintiff has sought, and received, permission to file a motion to remand. *See* ECF No. 10. Defendant intends to oppose the remand motion. However, if Plaintiff prevails on her motion, this Court will have no subject matter jurisdiction over the action now pending before it. As such, the parties request a stay pending a decision on Plaintiff's forthcoming motion to remand, which under the current schedule will be fully briefed by May 12, 2025. *Id*.

Thank you for Your Honor's time and attention to this matter. We will await the Court's direction.

Respectfully submitted,

Deanná M. Paul

Attorneys for Defendant Tal Alexander

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SO ORDERED. Date: April 14, 2025 New York, New York

> JOHN P. CRONAN United States District Judge